

In The Matter Of:
CHRISTOPHER SEARS vs.
JONATHAN BRADLEY, etc.

JONATHAN BRADLEY
October 22, 2021

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<p>IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF GEORGIA ATHENS DIVISION</p> <p>CHRISTOPHER SEARS, Plaintiff, vs. Civil Action File No.: 3:20-cv-00086-CAR</p> <p>JONATHAN BRADLEY, individually and in his capacity as an employee SHERIFF STACY JARRARD Individually and in Official Capacity as Lumpkin County Sheriff, Defendants.</p> <p>The deposition of JONATHAN BRADLEY via videoconference, taken on behalf of the plaintiff, taken pursuant to agreement of counsel, taken for all purposes authorized by the Georgia Civil Practice Act; the reading and signing of the deposition being reserved; taken before Julia L. Zamorano, CVR, Certified Court Reporter, commencing at 10:00 a.m., on this, the 22nd day of October 2021.</p>	<p>Page 3</p> <p>1 C O N T E N T S 2 E X A M I N A T I O N 3 Witness Page 4 JONATHAN BRADLEY 5 Cross-examination by Catherine S. Bernard 4 6 Direct Examination by William Peters 49 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>Page 2</p> <p>1 APPEARANCES OF COUNSEL: 2 For the Plaintiff: 3 CATHERINE S. BERNARD, Attorney at Law 4 Bernard & Johnson, LLC 5 5 Dunwoody Park 6 Suite 100 7 Atlanta, Georgia 30338 8 (404) 477-4755 9 Catherine@Justice.Law 10 11 For the Defendant: 12 WILLIAM W. PETERS, Attorney at Law 13 Georgia Department of Law 14 40 Capitol Square, S.W. 15 Atlanta, Georgia 30334-1300 16 (404) 458-4338 17 wpeters@law.ga.gov 18 19 Also present: Kelly L. Christopher 20 21 22 23 24 25</p>	<p>Page 4</p> <p>1 P R O C E E D I N G S 2 THE COURT REPORTER: Before we proceed, I 3 will ask counsel to agree on the record that 4 under the current national emergency pursuant to 5 Section 319 of the Public Health Service Act, 6 there is no objection to this deposition officer 7 administering a binding oath to the witness by 8 videoconference remotely. 9 One at a time, please state your name, the 10 party you represent, and your agreement on the 11 record. 12 MS. BERNARD: This is Catherine Bernard 13 representing Plaintiff Christopher Sears, and we 14 consent to that agreement. 15 MR. PETERS: This is Will Peters, 16 representing Defendant Jonathan Bradley, and we 17 consent to the agreement. 18 MS. CHRISTOPHER: This is Kelly Christopher, 19 representing Defendant Sheriff Jarrard, and we 20 also agree with that. 21 (Whereupon, 22 JONATHAN BRADLEY 23 was called as a witness and, having first been 24 duly sworn, was examined and testified as follows:) 25 CROSS-EXAMINATION</p>

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1 **MS. BERNARD:** And should we go ahead and
2 reserve all objections except for form and
3 responsiveness until first use? Is that
4 acceptable?
5 **MR. PETERS:** Sure.
6 **BY MS. BERNARD:**
7 Q All right. I am Catherine Bernard, counsel
8 for Plaintiff Christopher Sears. And just to, you
9 know, remind you, Trooper Bradley, you understand that
10 you're under oath for this; right?
11 A **Yes, ma'am.**
12 Q And that you have to give a verbal response
13 so that the court reporter can pick everything up?
14 A **Yes, ma'am.**
15 Q And you'll advise if you don't understand a
16 question for any reason?
17 A **I do. I understand that.**
18 Q And you're not under the influence of any
19 medications or alcohol or anything else that might
20 influence -- I know it's a silly question -- but
21 anything that might influence your answers?
22 A **No, ma'am, I'm not.**
23 Q Okay. Have you ever been deposed before,
24 Trooper Bradley?
25 A **Have I ever been deposed before?**

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1 Q Deposed. Have you ever gone through one of
2 these depositions like we're doing today?
3 A **No.**
4 Q Okay. So have you ever been involved in any
5 other civil cases in any way?
6 A **No.**
7 Q Okay. If you could, I guess, state your
8 full name for the record and where you reside
9 currently.
10 A **Jonathan Matthew Bradley.** [REDACTED]
11 [REDACTED].
12 Q I'm sorry. We've got a little bit of lag.
13 Where did you say the city you live is?
14 A **Canon, C-a-n-o-n, Georgia.**
15 Q And what county is that in?
16 A **Franklin.**
17 Q And are you from there originally?
18 A **I am.**
19 Q And who lives with you at your current
20 address?
21 A **My family.**
22 Q Okay. So is that your wife and kids? Any
23 extended family that stay with you?
24 A **My wife, kids, stepkids.**
25 Q Okay. And was this where you were living in

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1 the summer of 2018 during the incident that involved
2 my client, Christopher Sears?
3 A **It is. What does this have to do with the**
4 **case as to where I live and all my information?**
5 Q Honestly, I, kind of, feel the same way,
6 Trooper Bradley. You know, I usually handle criminal
7 defense cases. So I don't do a lot of these civil
8 depositions. My understanding is they often go
9 through a lot of these questions. I'm trying to cut
10 them down as much as possible to what's going to be
11 super relevant.
12 I'm not trying to pry. I'm not trying to
13 get into your business. I'm just trying to make sure
14 we cover all of the legal bases here. I've taken one
15 civil deposition before. So we're almost in the same
16 boat on that.
17 I do have to ask you if you've ever been
18 known by any other names?
19 A **No.**
20 Q Okay. And does your spouse work outside the
21 home? Sorry.
22 A **She does.**
23 Q Okay.
24 A **Yes.**
25 Q And where does she work?

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1 A **I'm still trying to figure out why does all**
2 **my wife's information and all this stuff have to do**
3 **with the case? She had nothing to do with it.**
4 Q And like I said, I understand if it seems a
5 little intrusive. I'm trying to keep it as limited as
6 possible. But there's just such a variety of things
7 that end up being relevant in these civil cases. I'm
8 just trying to cover all our bases. And I know your
9 attorney and the sheriff's attorney will have
10 something to say if I go outside of the bounds of
11 anything that is legally appropriate. But, you know,
12 we do just need some basic biographical information.
13 A **Okay. She works at Hart County 911**
14 **part-time.**
15 Q Okay. So how long have you been in law
16 enforcement, Trooper Bradley?
17 A **Approximately six years.**
18 Q And did you have another career before that
19 or did you go straight into law enforcement?
20 A **No, ma'am. I retired from the Army National**
21 **Guard. Did seven years of active duty and then joined**
22 **the Guard where I retired at.**
23 Q So that was seven years of active duty
24 service with the National Guard?
25 A **No, ma'am. I did seven years of active**

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1 duty, active Army, and then I joined the National
2 Guard, the Georgia National Guard, where I was
3 stationed for the additional 14 years where I retired
4 after 21 years.

5 Q Thank you so much for the clarification. So
6 you were active duty with the Army for seven years,
7 what was your role in the Army?

8 A Thirteen Bravo, field artillery.

9 Q And when you retired, what rank did you
10 retire at?

11 A Master sergeant E-8.

12 Q Okay. You came back from that and spent 14
13 years with the National Guard; is that right?

14 A I did.

15 Q Okay.

16 A Yes.

17 Q And forgive my ignorance. Is that a
18 full-time role?

19 A No, ma'am. It's part-time.

20 Q Okay. And so what other roles, if any, did
21 you have during that time?

22 A I mean, I worked for Baldor Electric. We
23 farm. We farm about a thousand acres here in Canon.

24 Q And is that a family farm?

25 A It is.

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1 Q And do you raise crops or animals or what
2 are the focuses?

3 A We grow crop, had chicken houses which are
4 breeder hens, and cattle and done some swine, hogs.

5 Q Thank you. And so what made you decide to
6 go into law enforcement?

7 A Well, before I joined the military, I had
8 always wanted to join the Georgia State Patrol. It
9 was kind of an ambition. It was kind of a desire that
10 I wanted to do. Joining the Army -- they had to stop
11 hiring for a while, so I didn't have the opportunity.
12 I continued with my career through the National Guard
13 and Army until 2014 whenever they opened up the hiring
14 and wanted to hire more troopers.

15 Q Okay. So then my understanding is that the
16 Georgia State Patrol had closed off some hiring paths
17 for a while or else you might have applied earlier?

18 A That's true.

19 Q So do you have a lot of other friends or
20 family members who have gone into law enforcement with
21 either the Georgia State Patrol or other agencies?

22 A I mean, now that I am a Georgia State
23 Patrol, we all are friends. But as far as family
24 members, no.

25 Q And now, which post are you stationed at?

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1 A Post 52 Hartwell.

2 Q So within your community of Canon, are you
3 close with the sheriff of Franklin County? Do you
4 have any connections with the sheriff's office there?

5 A I've known him all my life if that matters.

6 Q Okay. And are you a member of any churches
7 or social clubs or sports teams in your community?

8 A I'm a member of the FFA alumni, a member of
9 the Franklin County Young Farmers. I'm a member of
10 the VFW here in Lavonia, and a member of Canon Baptist
11 Church.

12 Q Thank you so much. So who was your
13 supervisor at the Georgia State Patrol back in 2018?

14 A Sergeant First Class Scott Andrews, Sergeant
15 O'Neil Saddler and Corporal -- I'm trying to remember.
16 It's changed so many times since then. I don't
17 remember who the corporal was to be honest. It's
18 changed several times due to promotions.

19 Q Okay. And what rank do you currently hold
20 with the Georgia State Patrol?

21 A Trooper first class 2.

22 Q And was that the same rank that you had in
23 2018?

24 A No. I was trooper first class 1.

25 Q And what's the difference between those two

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1 ranks?

2 A Just experience, years of service.

3 Q Was there anything in particular that
4 resulted in your promotion from trooper first class 1
5 to trooper first class 2?

6 A Just the years in service.

7 Q Okay. And when did that promotion take
8 place?

9 A After four and a half years on the road. It
10 would have been around early 2020.

11 Q Okay. So when you say 4.5 years on the
12 road -- is on the road as a patrol trooper, is that
13 the first responsibility you have after you finish
14 trooper school?

15 A I'm not sure what you mean by that.

16 Q Well, you can help me understand a little
17 bit. So you applied to become a Georgia State
18 Trooper. You're accepted into the program; is that
19 right?

20 A Uh-huh.

21 Q And then you go to trooper school, which I
22 understand is in Forsyth; right?

23 A It is for 33 weeks, yes, ma'am.

24 Q So you go through a 33-week training program
25 in Forsyth?

1 **A** **Yes, ma'am.**
2 **Q** And then after you graduate from that, what
3 is your next duty or role?
4 **A** **You're assigned to a post as far as -- I was**
5 **assigned to Post 52 Hartwell where I patrol on a daily**
6 **basis. We do DUI enforcement, work crashes, and**
7 **enforce traffic.**
8 **Q** So how far away is Post 52 from where you
9 live?
10 **A** **Twenty minutes.**
11 **Q** So pretty close. What is the geographic
12 area of Post 52?
13 **A** **Hartwell -- Hart County, Franklin County,**
14 **Elbert County.**
15 **Q** And so are there any special duties that
16 ever take you out of the Post 52 area?
17 **A** **Yes, ma'am. We are assigned to riot**
18 **control, or I've been assigned to several different**
19 **riot-control incidents, hurricane details, which I**
20 **went down to South Georgia around the Savannah area.**
21 **We have conducted road checks in several other**
22 **territories or counties.**
23 **Q** So when you find out about one of these
24 special duties in somewhere outside of Post 52, how do
25 you usually find out about the assignment?

1 **A** **Through scheduling or an e-mail which would**
2 **tell me that's where I'll be assigned for that day.**
3 **Q** So how far in advance do you usually know if
4 you're going to have an assignment outside of your
5 post?
6 **A** **Sometimes it's hours. Sometimes it's days.**
7 **Most of the time it's hours.**
8 **Q** You kind of just have to be ready to respond
9 as necessary; is that right?
10 **A** **Yes, ma'am.**
11 **Q** So have you testified in court before,
12 Trooper Bradley?
13 **A** **I have.**
14 **Q** About how many times would you say you've
15 testified?
16 **A** **A rough estimate, maybe 40 or 50.**
17 **Q** Okay. And are those on criminal cases where
18 you've been involved in bringing charges against
19 someone?
20 **A** **Yes.**
21 **Q** And of those 40 or 50 cases, how many of
22 them would you say took place within the Post 52 area?
23 **A** **All of them but two or three.**
24 **Q** Okay. And so I know one of those times was
25 when you came to Lumpkin County to testify in my

1 client's case, Christopher Sears. Do you recall what
2 the other ones that were outside of Post 52 were?
3 **A** **One was another DUI case which was outside**
4 **of the territory. I don't remember exactly what**
5 **county it was in. And then we testify in four -- our**
6 **territory and our ALS court is in Toccoa.**
7 **Q** Okay. And now have you ever been arrested
8 or involved in a criminal case on a personal level?
9 **A** **No.**
10 **Q** Okay. Have you ever gotten a traffic
11 citation?
12 **A** **Yes.**
13 **Q** Can you tell me about any traffic citations
14 that you've gotten?
15 **A** **I don't know why it's relevant, but, I mean,**
16 **what do you want to know?**
17 **Q** When was your first one, if you remember?
18 **A** **I think I was 16 years old. It would have**
19 **been 24 years ago.**
20 **Q** Okay. And about how many would you say
21 you've had since then?
22 **A** **Three, four maybe, if that.**
23 **Q** Okay. Have they been for speeding or
24 anything else?
25 **A** **Yes, ma'am, mostly for the speeding. I**

1 **don't recall getting any for any other reason.**
2 **Q** Okay. And have you ever declared
3 bankruptcy?
4 **A** **No.**
5 **Q** Okay. So you've been with Georgia State
6 Patrol now for like five or six years; is that right?
7 **A** **Yes. I went to school on August 15th of**
8 **2015.**
9 **Q** And in that time, have you had any work
10 complaints against you with Georgia State Patrol?
11 **A** **I'm sure -- sure I have.**
12 **Q** Okay. Are there any that you specifically
13 recall?
14 **A** **No, not specifically, no.**
15 **Q** Okay. Are there any internal complaints or
16 internal affairs issues that have come up for you?
17 **A** **No.**
18 **Q** Okay. Have you ever had any informal
19 reprimands from supervisors?
20 **A** **No.**
21 **Q** Have you ever been involved in any internal
22 complaints or internal affairs investigations
23 involving other troopers?
24 **A** **No.**
25 **Q** So have you ever made a complaint about

1 another trooper engaging in behavior that was wrong
2 for some reason?

3 **A No.**

4 **Q** Okay. And has any other trooper or person
5 that you've worked with accused you of doing something
6 wrong?

7 **A No.**

8 **Q** Okay. So have you ever received any notice
9 of claims in civil cases?

10 **A I don't understand the question. As far as**
11 **work-related? I don't have any civil cases besides**
12 **this one that I know of.**

13 **Q** Well, you know, when you mentioned this was
14 your first deposition, I was guessing the answer was
15 probably no. So you've never received another notice
16 that you are being sued in your individual or
17 professional capacity?

18 **A No.**

19 **Q** Okay. Have you ever been accused of
20 excessive force, wrongful arrest, or malicious
21 prosecution?

22 **A No.**

23 **Q** Okay. So what kind of policies do y'all
24 follow at the Georgia State Patrol?

25 **A Several thousand.**

1 **Q** Well, so what are the main policy documents
2 that you rely on for governing, kind of, daily
3 behavior as a state trooper?

4 **A I mean, that has to be a little more**
5 **specific. I mean, there's a book that's 10 inches**
6 **thick that has policies and regulations in it.**

7 **Q** Okay. So it's really just you've got a
8 massive number of policies, and you're responsible for
9 all of them; is that right?

10 **A Yes.**

11 **Q** Okay. Have you ever violated any of these
12 policies?

13 **A No.**

14 **Q** Have you ever seen any other officers
15 violate any of these policies?

16 **A No.**

17 **Q** Have you ever seen any other officers
18 violate any Georgia laws?

19 **A No.**

20 **Q** Have you seen any of your fellow officers
21 disciplined by either your own agency or any other
22 agencies?

23 **A No.**

24 **Q** Okay. So when do you remember first hearing
25 about the Rainbow Gathering that was taking place in

1 Lumpkin County in July of 2018?

2 **A The day before I was assigned to the detail.**

3 **Q** Okay. And now the incident involving my
4 client took place on June 29th, so actually a little
5 bit before the July 4th holiday. Had you already
6 been working in Lumpkin County on this incident or was
7 this your first day working there?

8 **A I worked there -- I can't remember. It's**
9 **been a long time. It was somewhere between two and**
10 **five days prior to that day.**

11 **Q** And so did you receive the notice of your
12 assignment in the same format that you discussed
13 earlier of receiving a scheduling e-mail?

14 **A I do.**

15 **Q** So do you recall what information was given
16 to you in that e-mail about your assignment?

17 **A Just that we would be assigned to Dahlonega,**
18 **Lumpkin County, for this day to perform road checks**
19 **and be visible.**

20 **Q** Do you know approximately how many troopers
21 from your post were also assigned to participate in
22 the events in Dahlonega in Lumpkin County?

23 **A Different days, somewhere between one and**
24 **two troopers per day. I mean, we only have like 11.**

25 **Q** So in your recollection, it was

1 approximately one or two troopers from Post 52 per day
2 that were over in Lumpkin County participating in the
3 road checks and being visible; is that right?

4 **A Yes, ma'am.**

5 **Q** So do you remember about how many days you
6 worked over in Lumpkin County during this period of
7 time?

8 **A Somewhere between two and five. I don't**
9 **know. It's been three or four years ago.**

10 **Q** Okay. And that's including the day that you
11 encountered my client, Mr. Sears?

12 **A That's correct.**

13 **Q** Now, in the e-mail that you received --
14 first of all, do you know if that e-mail has been
15 produced to your lawyers and turned over?

16 **A I do not.**

17 **Q** Did the e-mail contain any information about
18 the nature of what was going on over in Lumpkin County
19 that they might be requiring these extra road checks
20 and visibility?

21 **A The only thing I remember was the name of**
22 **it, which was the Rainbow Gathering or I think it had**
23 **another name as well. It didn't say the specifics or**
24 **anything. I didn't learn anything about it until we**
25 **got there.**

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1 Q Okay. Had you ever heard of the Rainbow
2 Gathering before?
3 A **Never.**
4 Q And had you heard of the other name that
5 might have been used to refer to the group?
6 A **Never.**
7 Q So did you have any, kind of, expectations
8 when you were given this assignment?
9 A **No. None at all. Just to go there.**
10 Q So when you first went over to Lumpkin
11 County, do you remember if the day that you
12 encountered Mr. Sears was the first day that you were
13 working over there?
14 A **It was not the first day.**
15 Q Not the first day.
16 A **No.**
17 Q So do you remember when the first day was?
18 A **I do not.**
19 Q Is that something that possibly would be
20 kept in the scheduling for Post 52? Do they keep
21 records of that, do you know?
22 A **It should be. I'm not sure.**
23 Q So when you first arrived over at Lumpkin
24 County, where did you go?
25 A **I think it was either the sheriff's office**

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1 **or we met at a building there in Lumpkin County and**
2 **were, kind of, given a briefing, I guess, told where**
3 **to go.**
4 Q Okay. And had you been to the Lumpkin
5 County Sheriff's office before?
6 A **Not that I recall before that, no.**
7 Q So were you acquainted with Sheriff Stacy
8 Jarrard or any of the Lumpkin County deputies?
9 A **No.**
10 Q And so what information was contained in
11 this briefing?
12 A **Just basically to be vigilant, and we**
13 **started out stopping cars, just basically the same**
14 **thing we do on a daily basis.**
15 Q Did they tell you there was any specific
16 reason that you needed to be vigilant for this event?
17 A **No, not that I recall.**
18 Q Did they tell you anything about the Rainbow
19 Gathering?
20 A **They just said -- as far as I recall, it was**
21 **just a assignment because of the increased number of**
22 **people there.**
23 Q So was there any discussion of, kind of, the
24 nature of the organization and whether there were any
25 unique factors with this organization or this

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1 gathering that would influence your law-enforcement
2 conduct?
3 A **I'm sorry. Clarify that, please.**
4 Q Well, were you told anything about the
5 Rainbow Gathering potentially being involved in
6 criminal activity or doing anything destructive or
7 anything that would be a threat to the public safety
8 of Lumpkin County or Georgia?
9 A **Not that I recall.**
10 Q So do you remember being told anything about
11 increases in thefts or other forms of crime?
12 A **Not that I recall. I don't remember that.**
13 Q Do you recall approximately how long the
14 briefing was?
15 A **Approximately 30 minutes, maybe 45.**
16 Q And do you recall approximately how many
17 other law enforcement officers were there with you?
18 A **Twenty-five, 30 maybe.**
19 Q And do you remember what agencies they were
20 mostly with or was it a mix?
21 A **It was a mix but a lot of Georgia State**
22 **Patrol.**
23 Q Anyone that you were already acquainted
24 with?
25 A **Some fellow troopers that I knew.**

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1 Q And did you know any of the other law
2 enforcement officers who weren't troopers who were
3 there?
4 A **I did not.**
5 Q Now, do you remember if Sheriff Stacy
6 Jarrard was at the briefing?
7 A **I don't recall.**
8 Q Do you recall if there were any individuals
9 there who were not members of law enforcement?
10 A **As far as I know, everybody there was law**
11 **enforcement.**
12 Q Do you recall who was giving the briefing?
13 A **I don't. I know that our supervisor -- I**
14 **think it was Sergeant First Class Coleman was the**
15 **supervisor over our detail that was briefing us as far**
16 **as state patrolmen.**
17 Q Okay. And now he's not one of your normal
18 supervisors; right -- Trooper Coleman?
19 A **No. He was over a different post.**
20 Q And so was he, sort of, supervising the
21 troopers who were participating in this
22 multijurisdictional task force?
23 A **He was.**
24 **MR. PETERS:** I'm going to object to form.
25 It misstates any testimony in evidence. It

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1 hasn't been described as a multijurisdictional
2 task force.
3 **MS. CHRISTOPHER:** I have the same objection.
4 **MS. BERNARD:** Okay. I'll certainly rephrase
5 so we can clear that up.
6 **BY MS. BERNARD:**
7 Q So it's your understanding that Trooper
8 Coleman was supervising the Georgia State Patrol
9 officers who had come to Lumpkin County to participate
10 in enforcement related to the events in late
11 June/early July of 2018?
12 **MR. PETERS:** I'm sorry. That misstates
13 evidence. He said supervisor -- Sergeant First
14 Class Coleman was over our detail.
15 **MS. BERNARD:** Okay. Well, absolutely, we
16 just want to make sure to get this cleared up.
17 **BY MS. BERNARD:**
18 Q So who was Trooper Coleman in charge of
19 supervising as far as you were aware?
20 **A A patrol.**
21 Q And were you told anything about the nature
22 of the group of law enforcement officers that was
23 being assembled for this task?
24 **A No, ma'am.**
25 Q I know that sometimes there are different

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1 operation names given to activities by the State
2 Patrol. Is that correct?
3 **A Operation names? No.**
4 Q So there was no operation name that you were
5 given related to the events in Lumpkin County?
6 **A No.**
7 Q Okay. So after you completed the briefing,
8 what happened next?
9 **A We were told to go stop cars. Go do our**
10 **job.**
11 Q And were you given any assignments about
12 where you would be posted?
13 **A Well, we went on the roadways. I mean,**
14 **anywhere around that area.**
15 Q And now, were you setting up on the side of
16 the road to see if you found any violations or were
17 you participating in roadblocks?
18 **MR. PETERS:** I'm sorry. I'm confused as to
19 what the question means.
20 **BY MS. BERNARD:**
21 Q I can break it up. You said you went on the
22 roadways. Does that mean that you and other -- I'll
23 just ask for you. Does that mean that you took your
24 trooper car and parked on the side of the road to
25 observe potential traffic violations or did you

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1 participate in any roadblocks where all vehicles were
2 being stopped? Is that more clear?
3 **A I was patrolling in my vehicle.**
4 Q Okay. So when you say you were patrolling
5 in your vehicle, can you walk us through the mechanics
6 of what that means in terms of where you go, how fast
7 you go, where you put your car, et cetera?
8 **A I drive the speed limit, and I go anywhere**
9 **in the state of Georgia.**
10 Q Do you ever set up on the side of the road
11 in a place to observe if people are committing traffic
12 violations as they drive by?
13 **A I do.**
14 Q Is that one of the things that you were
15 doing in Lumpkin County?
16 **A It was.**
17 Q Now, whose decision was it whether or not to
18 be, say, driving around looking for something or
19 stopped on the side of the road looking for something
20 or at a roadblock? Whose decision was that for your
21 activities?
22 **A I'm not sure. I don't know. I don't know**
23 **whose decision it was.**
24 Q Well, so you were given instructions to go
25 patrolling in your vehicle; is that right?

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1 **A That's correct.**
2 **MR. PETERS:** I want to clarify what date
3 we're talking about. Are we talking about June
4 29, 2018? Or are we talking about after the
5 first day he got there? What specific time
6 period?
7 **MS. BERNARD:** Well, I was asking about the
8 first day that he was working on this particular
9 detail in Lumpkin County. He said he could not
10 recall whether that was the day that he
11 encountered my client or not. So I'm just asking
12 about his first day in Lumpkin County working on
13 this particular assignment.
14 **MR. PETERS:** He said that it wasn't the
15 first day. He can't recall which day, but he
16 said it was not the first day he was there. I'm
17 just trying to figure out what we're asking
18 about. You know, we are asking about what his
19 role was after the first day he got there, and he
20 doesn't know which date that was specifically.
21 Is that what we're asking?
22 **MS. BERNARD:** Right. Yes.
23 **MR. PETERS:** Okay.
24 **BY MS. BERNARD:**
25 Q And just to see if this clarifies anything,

1 Trooper Bradley, were these two to five days that you
2 worked in Lumpkin County, were they consecutive? Were
3 they all together or were they split up over a period
4 of time?
5 **A I don't recall. Some were consecutive I**
6 **think.**
7 Q So do you recall if this first day that
8 we're talking about where the briefing took place, do
9 you recall if that was the day directly before you
10 encountered my client at the roadblock?
11 **A I do not.**
12 Q Okay. All right. So after you left the
13 briefing and had been given the instructions to go
14 patrolling, was it your individual discretion of where
15 to conduct this patrol and whether to do it while
16 moving or stopped?
17 **A I'm sorry. Was it my decision?**
18 Q Yes, was it your decision?
19 **A Partially I guess. I don't really**
20 **understand what you're asking.**
21 Q And obviously you understand the practices
22 of GSP much better than I do. But I'm just trying to
23 establish if it's a situation where you leave the
24 briefing and you are just, kind of, given discretion
25 to go patrol or stop or participate in one of the

1 roadblocks that's going on or if there's a specific
2 assignment as to which of those activities that you
3 should be participating in?
4 **A At different times, we were told to do**
5 **different things.**
6 Q And so who were the people who were giving
7 you instructions while you were in Lumpkin County?
8 **A I mean, as far as I remember, it was**
9 **Sergeant First Class Coleman.**
10 Q And so Sergeant First Class Coleman, he was
11 the one who told you to, you know, go stop cars, go do
12 our jobs, patrolling in your vehicle?
13 **A Yes.**
14 Q Okay. So what were some of the other
15 different things he instructed you to do?
16 **A What did you say -- patrolling my vehicle,**
17 **roadblocks, road checks?**
18 Q Right. I think you had said that after the
19 briefing -- and I'm sure that Ms. Christopher and Mr.
20 Peters will correct me if I've misheard anything --
21 that after the briefing, you were told to go stop
22 cars, go do our jobs, and at that point, you went on
23 the roadways patrolling in your vehicle. So at
24 different times, you were told to do different things.
25 I'm just wondering so what were the different

1 activities that you would have been involved in as a
2 trooper during that time?
3 **A Well, the road checks, I mean.**
4 Q And when you say, road check, is that also
5 referred to as a roadblock?
6 **A Yes.**
7 Q And now, did you have any role in selecting
8 the locations of the roadblocks?
9 **A No.**
10 Q How many different roadblocks did you
11 participate in while you were in Lumpkin County?
12 **A I do not remember.**
13 Q So do you remember if you participated in
14 any roadblocks on your first day that you were working
15 in Lumpkin County?
16 **A I do not.**
17 Q So do you remember if the roadblock on
18 Nimblewill Road, where you encountered my client
19 Christopher Sears, do you remember if that was the
20 first roadblock that you had done in Lumpkin County?
21 **A I don't remember in what order or anything.**
22 **We're talking about three years ago.**
23 Q Right. But you do remember participating in
24 the roadblock on Nimblewill Road on June 29th, 2018;
25 is that right?

1 **A I do.**
2 Q Do you remember when you received the
3 assignment to go participate in that roadblock?
4 **A No.**
5 Q Do you remember who assigned you to the
6 roadblock? If it would have been Sergeant Coleman or
7 someone else?
8 **A I don't.**
9 Q Do you remember if you got the assignment by
10 e-mail or if it was conveyed verbally?
11 **A I don't remember. I don't recall.**
12 Q Now, what kind of training have you received
13 on roadblocks?
14 **A Roadblocks?**
15 Q Yes.
16 **A I mean, just experience as far as doing**
17 **them, I guess, and where they're located. I mean, how**
18 **to do them, just checking every car. I mean, I don't**
19 **know what you're referring to as far as training.**
20 Q So you've been instructed in your training
21 as a trooper that you need to check every car in order
22 for it to be a valid roadblock?
23 **A Yes.**
24 Q Okay. Are there any other legal
25 restrictions that you have been trained on that have

1 to be followed at roadblocks?

2 **A They have to be visible, I guess, with the**
3 **lights. The lights have to be on. I guess -- I don't**
4 **know. That's what we do. We cut our lights on. At**
5 **nighttime, we put our vest on and have our flashlights**
6 **and we're there. As far as training, I've never been**
7 **to a class to conduct a roadblock.**

8 Q So do you recall approximately how long you
9 had been working at the roadblock on Nimblewill Road
10 before you encountered my client, Christopher Sears?

11 **A I don't.**

12 Q Okay. Do you recall it being a fairly busy
13 roadblock?

14 **A It was.**

15 Q And you actually made an audio and video
16 recording of your interaction with my client,
17 Mr. Sears; is that right?

18 **A That's correct.**

19 Q And in that video, you can see that there
20 are other officers engaged with other individuals
21 questioning them at the same time as your --

22 **MR. PETERS:** I'm sorry. I'm going to
23 object. If you're going to talk about the
24 content of a video or what's in the video, then
25 Trooper Bradley should be given the benefit of

1 being able to see the video while he's answering
2 questions about it.

3 **MS. BERNARD:** I would have no objections to
4 that whatsoever. I wasn't intending to ask a lot
5 of detailed questions. But I'm happy for him to
6 have the opportunity to review.

7 **MR. PETERS:** No. I mean as an exhibit in a
8 deposition. If you're asking the question, "In
9 the video, you can see," he needs to be shown the
10 video at the same time so that he can review it
11 before answering a question about it.

12 **MS. BERNARD:** Okay. I'll go ahead and I'll
13 save any that will require that level of review.
14 I'm not trying to trip you up, Trooper Bradley,
15 or anything. But I will go ahead and save those
16 and we can discuss what's on the video in more
17 detail.

18 **BY MS. BERNARD:**

19 Q But your recollection is that it was a busy
20 roadblock; is that right?

21 **A Yes.**

22 Q Now, have you had the opportunity to review
23 your report and the other materials that you generated
24 as a result of your interaction with Mr. Sears?

25 **A I have.**

1 Q Okay. And so what were your observations of
2 Mr. Sears when he came through your roadblock?

3 **A When he approached the roadblock, when I**
4 **started speaking with him, I observed he had bloodshot**
5 **watery eyes, and I smelled the odor of marijuana**
6 **inside the vehicle.**

7 Q And so what did you do next with regard to
8 Mr. Sears?

9 **A I think I asked him to step out of the**
10 **vehicle.**

11 Q And at that point, did you ask him about
12 conducting a search of his vehicle or did you inform
13 him that you were searching his vehicle?

14 **A I'm sure I informed him that I was going to**
15 **search his vehicle. But I don't recall 100 percent**
16 **how that went.**

17 Q And did you locate any marijuana in the
18 vehicle?

19 **A I don't recall.**

20 Q Did you find anything else that you do
21 recall when you were searching the vehicle?

22 **A I found San Pedro which is an illegal**
23 **substance inside the vehicle.**

24 Q Okay. And so what was the form that you
25 found this item in that you are calling San Pedro?

1 **A It was in a capsule bottle, in a pill**
2 **bottle, handwritten by someone. I'm not sure if it**
3 **was Mr. Sears or not. But that's what was written on**
4 **the bottle that it was contained in.**

5 Q Okay. So it was labeled as San Pedro Tea?

6 **A I'm not 100 percent sure but I think so,**
7 **maybe.**

8 Q Now, did you recognize -- when you read
9 this, did you know what San Pedro Tea was?

10 **A I did not.**

11 Q So what action did you take next after you
12 located this item?

13 **A I referenced to another trooper. And I**
14 **looked it up myself as far as what it was.**

15 Q Did the other trooper know anything about
16 it?

17 **A I don't recall. I know that when I**
18 **referenced it, it was referenced to, I think, LSD,**
19 **it's a hallucinogen.**

20 Q So when you said you looked it up yourself,
21 how did you look it up? Where did you find this
22 information?

23 **A The Internet, drug identifications,**
24 **websites.**

25 Q Do you recall was there a specific one that

1 you used?
2 **A I don't recall.**
3 Q Now, was this a law-enforcement or
4 trooper-specific resource or a publicly available
5 resource?
6 **A Public, I guess.**
7 Q And so you said it was listed, kind of,
8 along with LSD and in, sort of, association with
9 things that you knew to be hallucinogens?
10 **A Yes. And there were videos online that**
11 **talked about specific San Pedro and what it did to you**
12 **and how it made you feel and the things that it did**
13 **while you were taking the drug.**
14 Q Okay. So those videos, what was your
15 reaction when you saw those videos?
16 **A What do you mean my reaction?**
17 Q Well, did it make you concerned about any
18 dangerous behavior from Mr. Sears? Did it make you
19 concerned that he was on that substance at that time?
20 **A It did.**
21 Q And so you got Mr. Sears out of the car.
22 And he agreed to perform standardized field sobriety;
23 is that right?
24 **A That's correct.**
25 Q And you told him that you needed to conduct

1 the standardized field sobriety because of the items
2 that you had found; is that right?
3 **A You said needed to. I mean, I asked him to**
4 **perform standardized field sobriety, yes, ma'am.**
5 Q Okay. And how would you describe
6 Mr. Sears's manner with you? Was he polite or
7 combative?
8 **A He was a little, I guess, irritated, I**
9 **guess.**
10 Q Do you remember -- did he have a dog in the
11 car, do you recall?
12 **A I don't remember.**
13 Q Do you remember if he told you he was coming
14 back from hiking that day or anything like that?
15 **A I don't.**
16 Q Was there anything about his conduct that
17 made you think he was under the influence of a
18 hallucinogenic drug?
19 **A Yes, his eyes, and smell, the way he acted**
20 **is a possibility.**
21 Q Now, had you observed Mr. Sears driving into
22 the roadblock?
23 **A I did. I asked him to step out of the**
24 **driver's seat.**
25 Q Was there anything about the way he was

1 operating the motor vehicle that gave you concern that
2 he was a less-safe driver?
3 **A That I observed, I don't recall.**
4 Q So you don't recall seeing any unsafe acts
5 while he was driving the vehicle?
6 **A No.**
7 Q Okay. Now, had you ever met Christopher
8 Sears before?
9 **A Definitely not.**
10 Q Ever countered him anywhere at all?
11 **A No.**
12 Q And now he did give you his driver's
13 license; right?
14 **A As far as I remember, yes.**
15 Q And it was an Alabama driver's license; is
16 that right?
17 **A I think so, yes.**
18 Q But you were able to run it through your
19 system and check to see if it was a valid license and
20 if the insurance and registration on the vehicle were
21 valid; right?
22 **A I think so, yes. To my recollection, I did.**
23 Q And that all came back as license is valid,
24 registration is valid, insurance is valid?
25 **A I think so, yes.**

1 Q Now, did you find out about any warrants for
2 arrest that Mr. Sears had open?
3 **A I don't recall any.**
4 Q Do you recall finding any evidence of a
5 criminal history that raised alarm?
6 **A I didn't run any criminal history, but not**
7 **that I recall.**
8 Q Okay. So at any point, was there anything
9 about Mr. Sears's behavior that you considered
10 dangerous?
11 **A Besides the fact that I smelled marijuana**
12 **and he was driving a vehicle, that's considered**
13 **dangerous.**
14 Q But you did not find any marijuana in the
15 vehicle; right?
16 **A I don't recall everything that I found in**
17 **the vehicle. If there was a small amount, I wouldn't**
18 **remember.**
19 Q Okay. So at what point did you decide to
20 arrest Mr. Sears?
21 **A After conducting field sobriety and I**
22 **observed clues which indicated that he was under the**
23 **influence of marijuana or some type of drug.**
24 Q And did you inform him that you were going
25 to arrest him? How did that interaction transpire?

1 **A** I did. I told him he was under arrest,
2 placed cuffs -- placed him under arrest and read him
3 the Georgia Implied Consent law.
4 **Q** And how would you describe his reaction to
5 that?
6 **A** I don't recall. I don't remember his
7 reaction.
8 **Q** Do you recall him being concerned about what
9 was going to happen to his car and his dog?
10 **A** I don't, no, ma'am.
11 **Q** Do you recall you or other troopers allowing
12 one of the friends he was staying with to come and
13 pick up the car and the dog?
14 **A** I don't recall that. But that's usually
15 what we do. I mean, we don't just leave it there.
16 **Q** And I know you said you don't recall his
17 reaction. But do you recall any kind of agitation or
18 upset as you were arresting him and placing him into
19 your -- I'm sorry. Where did you put him after he was
20 arrested?
21 **A** I don't recall. I'm pretty sure I placed
22 him in the backseat of my car. I think he stood
23 outside of the vehicle for a little bit and then I
24 placed him in the backseat of the car. But I don't
25 recall him being agitated or anything like that.

1 **Q** So do you recall approximately how long you
2 had him in handcuffs?
3 **A** I don't. No, ma'am.
4 **Q** Did he say anything to you after you
5 arrested him?
6 **A** I mean, like I said, it's been three years
7 ago. It's on the video is all I know.
8 **Q** Okay.
9 **A** I don't recall.
10 **Q** So did you have any further interaction with
11 him? Did you take him to the jail yourself?
12 **A** I did.
13 **Q** Okay. And what happened when you took him
14 to the jail?
15 **A** I turned him over to the jail personnel
16 where they booked him and did whatever they do, I
17 guess.
18 **Q** And that was not a process that you were
19 participating in; was it?
20 **A** Nope. Once I dropped him off and did the
21 charge sheet, that was it. I got my cuffs back and
22 got back in the car.
23 **Q** Okay. So you did not go into the Lumpkin
24 County jail and make any observations of the practices
25 there; did you?

1 **A** No.
2 **Q** And what did you do after you dropped
3 Mr. Sears off at the jail?
4 **A** I don't remember it exactly. I'm not sure
5 what exactly we did after that.
6 **Q** Well, do you remember if you went back to
7 the roadblock?
8 **A** I don't.
9 **Q** Okay. Do you remember if you would have
10 gone and participated in a different roadblock?
11 **A** I don't recall exactly what happened after I
12 arrested Mr. Sears, no.
13 **Q** Now, were there any quotas or tallies of
14 arrests being made during this time?
15 **A** I'm sure there were. I don't remember. I
16 don't have anything to do with that.
17 **MR. PETERS:** I'm sorry. I'm going to object
18 to that. I'm confused as to what the term
19 "quota" means. There are two terms there that
20 could mean different things: quotas or tallies.
21 Do you mean just an accounting of who was
22 arrested at the roadblock?
23 **MS. BERNARD:** Right. Yes, and those are two
24 different terms. It was specifically an "or."
25 **BY MS. BERNARD:**

1 **Q** So you are sure there was a record being
2 made of all of the different people that were being
3 arrested during this operation? I'm not trying to put
4 words in your mouth.
5 **A** When you take them to the jail, I mean,
6 there's a record of them going to jail. I mean, when
7 we do a citation, there's a record of the citation.
8 I'm not -- I guess I'm not understanding if you're
9 asking that. I mean, that's on our computers as far
10 as our arrest records and where they went after.
11 **Q** Okay. Were you aware of any running tallies
12 being kept of arrests made during the operation in
13 Lumpkin County?
14 **A** No, I was not. Besides the citation that I
15 wrote, that's all I know about.
16 **Q** Did you arrest any other people during this
17 Lumpkin County operation?
18 **A** Yes. I'm pretty sure I did. I'm not
19 100 percent sure.
20 **Q** Do you recall --
21 **A** Do I recall what?
22 **Q** -- about how many people it would have been?
23 **A** I do not.
24 **Q** So do you recall -- you already said you
25 don't recall what happened after you arrested

1 Mr. Sears. Do you recall -- like I said, we're
2 working off that you said it was between two to five
3 days that you participated in the operation in Lumpkin
4 County. Do you recall if, at any other point during
5 that time, you participated in other roadblocks?

6 **A I'm sure I did. But I don't recall that,**
7 **no. It's been three years ago. Sometimes I have**
8 **trouble --**

9 **Q** I have trouble remembering court from last
10 week, so I think everybody understands. And do you
11 recall how you received your further assignments for
12 what you would be doing in Lumpkin County during that
13 time?

14 **A I don't.**

15 **Q** Would it be fair to say that you received
16 some instructions being spoken to you by Sergeant
17 Coleman or other troopers and some that were received
18 by e-mail?

19 **MR. PETERS:** I'm sorry. I'm going to object
20 because it's compound. It's two different
21 questions.

22 **MS. BERNARD:** Okay.

23 **BY MS. BERNARD:**

24 **Q** Did you receive instructions that were
25 spoken to you by Sergeant Coleman or other law

1 enforcement officers who were participating?

2 **A Yes.**

3 **Q** Okay. And following that first e-mail that
4 we talked about where you were assigned to go over to
5 Lumpkin County/Dahlonega, did you receive any further
6 e-mails regarding assignments within Lumpkin County?

7 **A I don't recall. I know that I was there**
8 **multiple days. But I don't recall about any e-mails.**

9 **Q** So did you stay over in Lumpkin County
10 during this time or did you commute back home to
11 Canon?

12 **A I went back home.**

13 **Q** Do you know if that's what the other -- do
14 you know if that's what the other members of other
15 posts were doing or were some of them staying in
16 Dahlonega?

17 **A I have no idea.**

18 **Q** Okay. And did you receive any special pay
19 or supplements based on this operation or
20 participation in Lumpkin County?

21 **A No. Did other people?**

22 **Q** That's what we're trying to find out. Now,
23 do you remember pulling anyone over during the
24 roadblocks who was a local to Lumpkin County?

25 **A Yes.**

1 **Q** And do you recall if any of those
2 individuals were subjected to field sobriety tests or
3 arrested?

4 **A I don't recall. I don't remember if they**
5 **were subjected to field sobriety or anything. But if**
6 **they were under the influence, I'm sure they were.**

7 **Q** Was there any difference in treatment
8 between the way people from Lumpkin County and
9 out-of-town folks were treated that you observed?

10 **A No.**

11 **MS. BERNARD:** Well, I think I am coming to
12 the end of my questions. If we could maybe just
13 do a short break, it's almost 11:30. I'll make
14 sure I have everything, and then we can wrap up.
15 Does that work?

16 **MR. PETERS:** That works.

17 (A break was taken from 11:25 a.m. until
18 11:34 a.m.)

19 **MS. BERNARD:** Okay. We're back.

20 **BY MS. BERNARD:**

21 **Q** I just have one final question for you,
22 Trooper Bradley. Since this is the first time you've
23 been sued in a civil case like this, what is your
24 reaction to that? How do you feel about it?

25 **MR. PETERS:** Objection to form. I don't

1 know what we're asking him. How he feels about
2 the lawsuit?

3 **MS. BERNARD:** You know, it's his first time,
4 you know, being in this situation. So I'm just
5 asking, as an experienced law enforcement
6 officer, if he has any particular reaction to
7 these events and being deposed and going through
8 this process.

9 **THE WITNESS:** I guess, to be respectful, I
10 think it's long and drawn-out and a waste of a
11 lot of people's time.

12 **BY MS. BERNARD:**

13 **Q** Well, I appreciate your candor. And in the
14 spirit of trying to waste as little of everybody's
15 time as possible, I think we've got all our questions
16 in. We do have -- of course, Trooper Bradley, two
17 years ago, we spent some time discussing the video in
18 detail. So I'm not going to go back through
19 everything that you've already sworn testimony to. I
20 am assuming that you stand by everything that you have
21 previously testified to under oath; is that right?

22 **MR. PETERS:** I'm going to object. He hasn't
23 been given the benefit of reviewing everything
24 he's previously testified to under oath. So I
25 don't know how he's going to answer a question

1 about whether he stands by the testimony.
2 **BY MS. BERNARD:**
3 Q Okay. Well, do you remember when we were at
4 the Lumpkin County Superior Court back in August
5 of 2019 arguing about this, Trooper Bradley?
6 A I remember going to court, yes, ma'am.
7 Q Okay. Do you remember being under oath and
8 discussing your interaction with Mr. Sears?
9 A Partially. Again, it's been two years ago.
10 Q Well, and in light of the amount of time
11 rather than sitting here and trying to, you know, go
12 back and forth on is your recollection better now or
13 is it then, I'm just asking you if you have any reason
14 to think you would have testified untruthfully or
15 incorrectly under oath in Lumpkin County?
16 A No.
17 MS. BERNARD: All right. I think that's
18 everything we have. Thank you for your time,
19 Trooper Bradley.
20 MS. CHRISTOPHER: Are y'all okay -- do you
21 want to get started at --
22 MR. PETERS: I have a few questions.
23 MS. CHRISTOPHER: Sorry. Sorry.
24 **DIRECT EXAMINATION**
25 **BY MR. PETERS:**

1 Q Trooper Bradley, you had testified a bit
2 about the Georgia Department of Public Safety's policy
3 manual. And you had described the manual as being
4 thick; right?
5 A Yes, sir.
6 Q So meaning that there are a lot of policies
7 that govern that agency; right?
8 A That's correct.
9 Q I wanted to clarify something you were
10 asked. Ms. Bernard asked you whether you were
11 responsible for the policies. Is it more accurate to
12 say that you are responsible for the policies that
13 govern state troopers in your position?
14 A That is correct.
15 Q Meaning that if a policy says it is the
16 responsibility of the commissioner to do X, that
17 policy -- you're not responsible for implementing that
18 policy, the commissioner is; right -- just to give an
19 example?
20 A Right. Well, that would be correct. Yes.
21 Q And the same thing goes with supervisory
22 personnel. The policy governs the actions of
23 supervisory personnel. You would not be responsible
24 for implementing that policy because you are not a
25 supervisory personnel; correct?

1 A Yes, sir.
2 Q Okay. And next I have a few questions about
3 you're asked about your training regarding the
4 roadblocks. You testified that you had not attended a
5 class regarding roadblocks; right?
6 A Correct.
7 Q But during a roadblock, do you implement all
8 of the other training that you've received as a state
9 trooper?
10 A I do.
11 MR. PETERS: No further questions.
12 MS. BERNARD: I don't believe we have
13 anything further at this time either.
14 MS. CHRISTOPHER: I don't have any
15 questions.
16 (Deposition concluded at 11:38 a.m.)
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1 **DISCLOSURE**
2 **STATE OF GEORGIA** Deposition of JONATHAN BRADLEY
3 **COUNTY OF CHEROKEE** Date: October 22, 2021
4 Pursuant to Article 10.B of the
5 Rules and Regulations of the Board of Court Reporting
6 of the Judicial Council of Georgia, I make the
7 following disclosure:
8 I am a Georgia Certified Court
9 Reporter. I am here as a representative of American
10 Court Reporting Company, Inc.
11 I am not disqualified for a
12 relationship of interest under provisions of O.C.G.A.
13 9-11-28(c).
14 American Court Reporting Company,
15 Inc., was contacted by the offices of Jordan A.
16 Johnson to provide court reporting services for this
17 deposition.
18 American Court Reporting Company,
19 Inc., will not be taking this deposition under any
20 contract that is prohibited by O.C.G.A. 15-14-37(a)
21 and (b).
22 American Court Reporting Company,
23 Inc., has no exclusive contract to provide reporting
24 services with any party to the case, any counsel in
25 the case, or any reporter or reporting agency from
whom a referral might have been made to cover this
deposition.
American Court Reporting Company,
Inc., will charge its usual and customary rates to all
parties in the case, and a financial discount will not
be given to any party to this litigation.
This, the 4th day of November 2021.
JULIA L. ZAMORANO, CVR, CCR
6320-7516-0073-0112

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1 C E R T I F I C A T E

2 STATE OF GEORGIA)

3 COUNTY OF CHEROKEE)

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the caption,
6 and the proceedings were reduced to typewriting under
7 my direction and control.

8 I further certify that the transcript is a
9 true and correct record of the evidence given at the
10 said proceedings.

11 I further certify that I am neither a
12 relative or employee or attorney or counsel to any of
13 the parties, nor financially or otherwise interested
14 in this matter.

15 This, the 4th day of November 2021.

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JULIA L. ZAMORANO, CCR, CVR
6320-7516-0073-0112

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1 E R R A T A S H E E T

2 In Re: CHRISTOPHER SEARS v. JONATHAN BRADLEY,
3 individually and in his capacity as an employee
4 SHERIFF STACY JARRARD Individually and in Official
5 Capacity as Lumpkin County Sheriff
6 IN THE UNITED STATES DISTRICT COURT MIDDLE
7 DISTRICT OF GEORGIA ATHENS DIVISION
8 File No. 3:20-cv-00086-CAR

9 Deposition of Jonathan Bradley, taken on October 22,
10 2021.

11 I have read the transcript of my deposition and find
12 that no changes are necessary Jonathan Bradley.
13 or

14 Having read the transcript of my deposition, I wish to
15 make the following changes: (Please state reason.)

16 Page _____, Line _____:

17 Page _____, Line _____:

18 Page _____, Line _____:

19 Page _____, Line _____:

20

21

22

23

24

25

Jonathan Bradley

A			
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